

REDACTED VERSION

EXHIBIT B

REDACTED VERSION

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT F. KENNEDY, JR., AMERICAN
VALUES 2024,

Plaintiffs,

v.

META PLATFORMS, INC., ET AL.,

Defendants.

Case No. 3:24-cv-02869-WHO

**DECLARATION OF [REDACTED] IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION**

Hon. William H. Orrick
Courtroom 02, 17th Floor
Date: August 28, 2024
Time: 2:00 PM

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1 I, [REDACTED] declare:

2 1. I have been employed by Meta Platforms, Inc. as a High Priority Escalations
3 Specialist for over two years. In that role, I am responsible for identifying, preventing, and
4 mitigating integrity and support risks across the Meta ecosystem, particularly during critical
5 moments.

6 2. I submit this declaration in support of Meta's Opposition To Plaintiffs' Motion For
7 A Preliminary Injunction. I have personal knowledge of the information contained in this
8 declaration.

9 3. I have reviewed the history of Meta's enforcement actions on the Instagram user
10 account @houseinhabit, which I understand to be the Instagram account of Plaintiff Jessica Reed
11 Kraus.

12 4. A history of enforcement actions can affect the extent to which a user's content is
13 recommended to other Instagram users.

14 5. I performed a search of all content posted by Reed Kraus to her Instagram user
15 account for the keywords "RFK" and "Kennedy." There were no enforcement actions taken on
16 Reed Kraus's Instagram user account for any of the content contained in that search.

17 6. I understand that Reed Kraus has stated that, on May 3, 2024, she was locked out
18 of Instagram for about 30 minutes.

19 7. On May 3, 2024, Meta's automated systems determined that Reed Kraus violated
20 Meta's policies against threats of physical harm when she posted the following on her Instagram
21 user account: "* unfortunately I don't have time today to argue with you in DM's about Palestine
22 and facemasks. All I'm saying is - if I show up on campus and see my kid in a facemask spray
23 painting the school I broke my back to send him to, demanding vegan food and denouncing bagels,
24 I'm spanking him in front of the whole student body, telling him to 'stop being an idiot.'"

25 8. Because the May 3, 2024 post violated Meta's policy against posts containing an
26 aspirational intent to commit low severity violence, the post was automatically deleted, and her
27 Instagram user account was placed into a "checkpoint."

28 9. A checkpoint temporarily restricts a user's access to their account.

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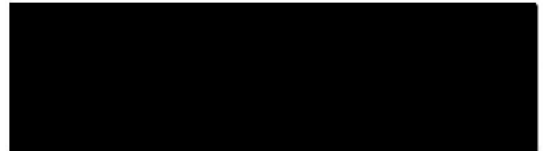
1 10. Reed Krauss cleared the checkpoint and had access to her Instagram user account
2 12 minutes and 22 seconds after it was imposed.

3 11. The checkpoint was not imposed on Reed Kraus's Instagram user account for any
4 post containing information about Plaintiff Kennedy.

5
6 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
7 United States of America that the foregoing is true and correct.

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9 EXECUTED this 5th day of August 2024 in Austin, Texas.

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CERTIFICATE OF SERVICE

I hereby certify that on August 06, 2024, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: August 06, 2024

By: /s/ Sonal N. Mehta
Sonal N. Mehta

ATTORNEY ATTESTATION

I, Sonal N. Mehta, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory.

Dated: August 06, 2024

By: /s/ Sonal N. Mehta
Sonal N. Mehta